

ILLINOIS

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS
COMMERCE COMMISSION

2003 DEC 17 A 11:19

CHIEF CLERK'S OFFICE

ILLINOIS INDEPENDENT TELEPHONE }
ASSOCIATION }

Petition for initiation of an investigation of }
the necessity of and the establishment of a }
Universal Service Support Fund in }
accordance with §13-301(d) of the Public }
Utilities Act. }

Docket No. 00-0233

Illinois Commerce Commission On Its Own }

Investigation into the necessity of and, if }
appropriate, the establishment of a Universal }
Support Fund pursuant to Section 13-301(d) }
of the Public Utilities Act. }

Docket No. 00-0335

**MOTION OF ALHAMBRA-GRANTFORK TELEPHONE COMPANY
TO OBTAIN ILLINOIS UNIVERSAL SERVICE FUNDING**

NOW COMES Alhambra-Grantfork Telephone Company ("AGTC"), by its attorneys, and hereby moves the Illinois Commerce Commission for an order directing the administrator of the Illinois Universal Service Fund to collect additional funds and to pay over to Alhambra-Grantfork Telephone Company certain Illinois Universal Service Support Funds and in support thereof states as follows:

1. On September 18, 2001, the Illinois Commerce Commission entered an order entitled "Second Interim Order" that established the Illinois Universal Service Fund (USF) and declared the procedure under 220 ILCS 5/13-301(d) for eligibility for independent local exchange carriers to receive USF support.

2. During the hearings in this docket, local exchange carriers introduced a Form 1.01, which used an 11.21% rate of return calculation for eligibility for USF.

3. On rehearing, the Commission entered an order on March 13, 2002, which established the Illinois Universal Service Fund and declared the affordable rate to be

\$20.39 per month, based upon Verizon's rural rate. The order on rehearing also established a phase in for the affordable rate. Following the order on rehearing, AGTC received the sum of \$7,740 from the USF, which then terminated.

4. Since the September 18, 2001 order and the March 13, 2002 order on rehearing, AGTC has had a substantial change in its financial circumstances and is in need of Illinois Universal Service funding.

5. Based upon the 2002 test year, AGTC's current rate of return is 5.75% and AGTC has not received any USF support for 2003.

6. Under the qualifications set forth in the September 18, 2001, Second Interim Order, AGTC qualifies for USF support in the amount of \$163,982.

7. AGTC requests that this motion be set for hearing to allow it to present evidence in support of its qualification for USF funding.

WHEREFORE, Alhambra-Grantfork Telephone Company respectfully requests that the Commission enter an order:

A. Directing the Administrator of the Illinois Universal Service Fund to collect additional funds and pay Alhambra-Grantfork Telephone Company universal service support in the amount of \$163,982 effective January 1, 2003 and thereafter.

B. For such other and further relief as the Commission deems just.

Respectfully submitted,

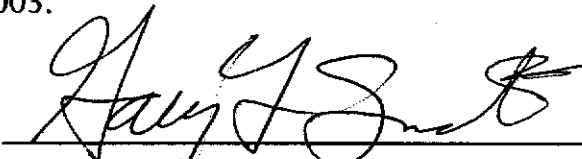
ALHAMBRA-GRANTFORK TELEPHONE COMPANY

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the persons listed on the following Service List by electronic mail or by enclosing the same in an envelope addressed to each person at his/her address listed thereon with postage fully prepaid, and by depositing said envelope in a U.S. Post Office Mail Box in Springfield, Illinois on this 11th day of December, 2003.



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